

### REMARKS

The Office action of April 6, 2011, has been carefully considered.

Claim 95 has been rejected under 35 USC 103(a) as obvious over Jacobson in view of Luke, while Claim 96 has been rejected as obvious under 35 USC 103(a) over Jacobson in view of Luke and Townsend and Claim 97 has been rejected under 35 USC 103(a) as obvious over Jacobson in view of Luke and Lingafelt.

Claim 95 has now been amended to better define the invention. In particular, the invention is directed to a protection system for a computerized device, where the computerized device comprises an operating system and at least one peripheral device which can be a storage device and/or a communication device. The protection system comprises a monitoring and capturing subsystem configured to monitor activities relating to the storage and/or communication device and to detect and act against suspicious or dangerous activity, and an encrypted data base which is now defined as being in operative connection with said operating system, as can be seen in Figure 1 of the application. This monitoring and capturing subsystem is configured and arranged to receive data from said encrypted data base, and to block activities of said computerized device in violation of the default rules of the data base. This function can be seen in Figure 1b of the application.

Claim 95 has also been amended to incorporate the user interface, which is operatively connected to the operating system and which includes means for performing at least one function selected from the group consisting of learning acceptable behavior patterns to be added to the database, warning the user of perceived dangers based on the database

and requesting user authorization to perform an action. The user interface is described in paragraph [0105] of the application as published.

The Jacobson reference is directed to an electronic record management system, and not to a system which protects the user against unwarranted intrusions and activities. The Office action notes that the content of the database has not been given patentable weight because the information represents "nonfunctional descriptive material that does not impart functionality (MPEP 2106.01)."

Claim 95 has now been amended such that information contained in the database does impart functionality when employed as a computer component. Thus, there is now a functional interrelationship defined between the data in the database and other claimed aspects of the invention would permit the data structure's functionality to be realized.

As now defined, the encrypted database is operatively connected with the operating system of the computerized device, and acts in conjunction with the monitoring and capturing subsystem to allow the subsystem to block activities in violation of the default rules contained in the database.

According to the Jacobson reference, it is the e-mail records themselves that are encrypted, and not a set of default security rules. Moreover, the purpose of Jacobson is to ensure user compliance with a set of security rules, and not to protect the user against unwarranted intrusion in violation of security rules.

The Luke reference has been cited to show monitoring of excessive hard drive activities, but does not otherwise cure the defects of the Jacobson reference.

Townsend and Lingafelt et al have been cited to show aspects of the invention recited in Claims 96 and 97, respectively, but also do not cure the defects of the Jacobson

and Luke references.

Withdrawal of these rejections is requested.

In view of the foregoing amendments and remarks, Applicants submit that the present application is now in condition for allowance. An early allowance of the application with amended claims is earnestly solicited.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Ira J. Schultz', with a stylized, cursive script.

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